

# EXHIBIT E

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

AiPi, LLC,

Movant,

v.

NETFLIX, INC.,

Respondent.

Case No. 1:24mc2 (LMB/WEF)

**NOTICE OF FILING AGREED INITIAL LIST OF SEARCH TERMS**

Pursuant to the Court’s Order entered January 27, 2025 [Dkt. No. 65], Netflix, Inc. submits this initial list of search terms, which it will provide to the forensic discovery vendor. AiPi, LLC has agreed to this initial list of terms.

- Netflix
- Fees and (Netflix or Valjakka or Lauri)
- 285 and (Netflix or Valjakka or Lauri)
- Sanctions
- Valjakka
- Lauri
- CDN
- (exclusive and licensee and (\*102 or \*167))
- (cancellation and CDN)
- Ownership and (Netflix or Valjakka or Lauri or \*167)
- (own and (\*167\* or patent))
- Standing and (Netflix or Valjakka or Lauri)
- Tepora
- Jarno
- Onni
- Hietalahti
- (Asianajotoimisto Tamora Legal)
- “fraudulent transfer”
- Fraud and (Netflix or Valjakka or Lauri)
- CUVTA
- “California uniform voidable transactions act”
- Injunction and (Netflix or Valjakka or Lauri)
- Contempt

- IPRA
- “IPR Avenue”
- DMTS
- Pekka
- Pakarinen
- Juha
- Setälä
- e-3
- SBO
- Suomen
- Biisi
- “nunc pro tunc”
- assignment and (Netflix or Valjakka or Lauri or \*167 or \*102 or CDN)
- retroactive
- bankrupt\* and (Netflix or Valjakka or Lauri)
- Helsinki
- (Utilization and Agreement) and (Netflix or Valjakka or Lauri or rever\* or Suomen Biisi or assign\* or own\* or \*PTO or abandon\*)
- (Sopimus e-3\* DMTS Keksinnön Hyödyntämisestä)
- Finnish Court
- (“Market Court” or Markkinaoikeus or Marknadsdomstolen)
- (Helsinki Court of Appeal or “Helsingin hovioikeus”)
- (Helsinki District Court or Helsingin kärjäoikeus)
- Iiro
- Karesniemi

Dated: January 29, 2025

Respectfully submitted,

*/s/ Cailyn Reilly Knapp*

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th of January, 2025, I electronically filed a copy of the foregoing with the Clerk of Court using the Court's CM/ECF System which will send notification of such filing to all registered filers:

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